



February 16, 2006

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Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Federal-State Joint Board on Universal Service, CC Docket No. 96-45*

Dear Ms. Dortch:

The State University of New York at New Paltz submits this letter to express our concerns that a number-based contribution mechanism would have a detrimental impact on this institution.

We have calculated that our per month federal universal service obligation would increase from \$4,000 per year to \$42,000 per year if a number-based approach were adopted, assuming that the per-number fee was \$1.00.

SUNY New Paltz does not have the resources to offset this substantial increase. If adopted, the FCC's action would require us to consider cutting other institutional services or whether to eliminate individual telephone service for students in campus housing, which puts them at risk in the case of an emergency and is, in effect, cutting our services to them.

We fully support the goals of universal service, and commend the FCC for their efforts to extend telecommunications services to all Americans. However, because SUNY New Paltz is a public institution with many funding programs for students from poor rural areas who would otherwise not have a chance for education, it seems paradoxical that those students may have access to advanced technological services at home but will not have access to these services while in college.

We, SUNY New Paltz, ask the FCC to proceed with caution in adopting a number-based plan that does not account for the specific concerns of colleges and universities. Further, we believe that any reform in this proceeding should not substantially disadvantage any particular class of customers, including the higher education community.

We urge you to study and understand the full impact of the change in the contribution methodology before any proposals be formally adopted by the Commission.

Respectfully submitted,

Kathryn C. Stevens
Director, Telecommunications

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